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By Facsimile

The Honorable Kimba M. Wood
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

MEMO ENDORSEDRe: *United States v. El-Hanafi and Hasanoff*, 10 CR 162 (KMW)

Your Honor:

I write on behalf of both defendants to respectfully request that the motion schedule established on February 17, 2011 be modified as follows: defense motions due June 3, 2011, government's opposition due August 2, 2011, and defense reply due August 17, 2011.

Granted.
KMW

The adjournment is requested because the defense needs more time to review new discovery recently provided by the government. In addition, the government has informed us that there is additional discovery related to Mr. El-Hanafi's communications with United States government employees concerning his placement on the no-fly list that it hopes to produce within the next several weeks. We anticipate that these materials will bear directly on Mr. El-Hanafi's motion to suppress.

The government has no objection to the request.

We consent to the exclusion of the additional time from the computation of Speedy Trial time.

We appreciate Your Honor's consideration.

Respectfully submitted,

Justine A. Harris
Attorney for Mr. El-Hanafi

Time has already
been excluded
through 1/23/12.

cc: All Counsel (via email)

5-12-11
SO ORDERED: N.Y., N.Y.

KIMBA M. WOOD
U.S.D.J.